

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

Case 3:22-cr-00011-TAV-DCP Document 5 Filed 02/18/22 Page 1 of 5 PageID #: 37

knowingly, intentionally and without authority, distribute and possess with intent to distribute fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, one (1) kilogram or more of a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

FORFEITURE ALLEGATIONS

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and/or 846, as set forth in this Indictment, the defendants, [REDACTED], also known as [REDACTED] and [REDACTED], also known as [REDACTED], [REDACTED] ARIEL N. CLAYTON, LATEASHA T. BROWN [REDACTED], also known as [REDACTED], also known as [REDACTED] MITCHELL CALLAN, [REDACTED], and [REDACTED], also known as [REDACTED] shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any

property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to the following:

MONEY JUDGMENT:

Proceeds the defendants, [REDACTED], also known as [REDACTED] and [REDACTED], also known as [REDACTED] [REDACTED], ARIEL N. CLAYTON, LATEASHA T. BROWN, [REDACTED], also known as [REDACTED] [REDACTED], also known as [REDACTED] MITCHELL CALLAN, [REDACTED], and [REDACTED], also known as [REDACTED] personally obtained as a result of the violations of Title 21, United States Code, Sections 841 and/or 846.

FIREARMS AND AMMUNITION:

- a. Springfield Arms XP5 .45 caliber handgun seized from LATEASHA BROWN;
- b. Springfield Arms XD .45 caliber handgun, seized from LATEASHA BROWN;
- c. Ruger Model LCP .380 caliber handgun, seized from LATEASHA BROWN;
- d. Glock, Model 19 handgun seized from LATEASHA BROWN;
- e. Ammunition.

VEHICLES:

A Red 2019 BMW 740, VIN WBA7E2C53KB216805, License Plate CQV6712

BANK ACCOUNTS:

Navy Federal Credit Union Accounts in the name of [REDACTED] and/or Endgame Entertainment, LLC

DELTA SKYMILES ACCOUNTS:

- a. In the name of [REDACTED], Skymiles Account Number 9243518744;
- b. In the name of [REDACTED], Skymiles Account Number 9141327800;
- c. In the name of [REDACTED] Skymiles Account Number 9188588579;
- d. In the name of Lateasha BROWN, Skymiles Account Number 9391177475;
- e. In the name of Ariel CLAYTON, Skymiles Account Number 9033926800;

f. In the name of [REDACTED], Skymiles Account Number 9080115588.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

NOTICE OF ENHANCED PENALTIES

1. Before committing the offense charged in Count One of this Indictment, the defendant, [REDACTED], also known as [REDACTED] and [REDACTED] had at least one final conviction for a serious drug felony, for which he served at least 12 months in custody and was released from custody no more than 15 years before the commencement of the offense charged in Count One. As a result, the defendant, [REDACTED] also known as [REDACTED] is subject to an enhanced penalty under Title 21, United States Code, Sections 841(b)(1)(A) and 851.

2. Before committing the offense charged in Count One of this Indictment, the defendant, [REDACTED], also known as [REDACTED] had at least one final conviction for a serious drug felony, for which he served at least 12 months in custody and was released from

custody no more than 15 years before the commencement of the offense charged in Count One.

As a result, the defendant, [REDACTED], also known as [REDACTED] is subject to an enhanced penalty under Title 21, United States Code, Sections 841(b)(1)(A) and 851.

A TRUE BILL:

[REDACTED]
GRAND JURY FOREPERSON

FRANCIS M. HAMILTON III
UNITED STATES ATTORNEY


ALAN S. KIRK
Assistant United States Attorney